## **Management System: Quality Assurance and Oversight**

**Subject Area: Oversight and Assessments** 

# **Procedure: Independent Assessment**

**Issue Date and Revision Number:**10-24-13 1

**Lead Subject Matter Expert:** Ken Armstrong

**Management System Owner:** 

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### 1.0 Applicability

This procedure applies to all independent oversight activities performed by the EMCBC and participating Small Sites. This procedure meets the requirements of EM-QA-001 *EM Quality Assurance Program (QAP)* and DOE Order 414.1D, *Quality Assurance* Criteria 10, *Independent Assessments*. Independent assessments also use guidance provided in DOE G 414.1 1B, *Management Assessment and Independent Assessment Guide*. Independent oversight is not limited to Quality Assurance and this procedure can be used for Independent Oversight of other EMCBC Small Site programs, including Conduct of Operations, Integrated Safety Management, Environmental Management, Safety Culture, and other requirements. Independent assessments shall be performed by personnel knowledgeable in the subject area, trained in assessment techniques and by personnel who do not have responsibility for performing the activities being audited. The scope and duration of the assessment determines the composition of Independent Assessment Team. Assessment Teams may be as small as one Lead Assessor or as large as a Lead Assessor and a Team of Assessors. Results of independent assessments/audits are documented and deficiencies are verified. These deficiencies are graded based on their significance as follows:

**Significant Deficiencies:** Deficiencies that if uncorrected, could have a serious effect on the environment, safety, health, security, or operational integrity. This includes Significant Conditions Adverse to Quality. An "Extent of Condition" determination should be considered. Significant Deficiencies shall be tracked, corrective action plans approved and corrective actions verified.

**Deficiencies:** Non-compliances with procedural, contractual or regulatory requirements identified during an assessment. This includes Conditions Adverse to Quality. They are used to indicate inadequacies or safety issues that warrant management attention. Deficiencies shall be tracked, corrective action plans reviewed and corrective actions verified.

**Observation:** A condition (either positive or negative) that should be brought to the attention of Line Management but does not meet the definition of a deficiency. This includes comments, observations, opportunities for improvement, and noteworthy practices.

## 2.0 Required Procedure

ASSESSM	ENT PLANNING			
Step 1	Lead Assessor: Conducts assessment-scoping activities with the management of the organization subject to assessment and determines the scope of the assessment such as:  • Applicable programmatic elements to be evaluated			
	Work activities and critical processes (including timing) subject to			
	requirements.			
	Key personnel to be interviewed during the assessment.			
	Documents that must be available prior to or during the assessment			
Step 2	Lead Assessor: If necessary, selects an appropriate number of Assessment Team Members who collectively have experience or training commensurate with the scope, complexity, or special nature of the work requiring assessment.			
Step 3	Lead Assessor: If the assessment is performance based, selects one or more technical specialists to assist in assessing the adequacy of technical processes.			
Step 4	Lead Assessor: Ensures qualification records for any additional Assessment Team Members, including technical specialist(s), are complete and that each individual is qualified in accordance with procedure <i>Qualification of Assessment Personnel</i> .			
Step 5	Lead Assessor: Develops an Assessment Plan that identifies, as a minimum:			
	Cover page including Assessment Plan Title, Date, Organization Assessed, and Signature Block			
	1.0 Assessment Scope			
	2.0 Requirements For Performing The Assessment			
	3.0 Assessment Personnel 4.0 Work/Area of Assessment			
	5.0 Organization to be Notified			
	6.0 Applicable Documents/Criteria			
	7.0 Assessment Schedule			
	Note: See sample Recommended Independent Assessment Plan Format			
Step 6	Lead Assessor: Signs and dates the Assessment			
_	Plan and forwards to the organization subject to assessment.			
Step 7	Lead Assessor: Assigns required reading to Assessment Team Members, if necessary.			
Step 8	Lead Assessor and any additional Assessment Team Members: Prepare sections 1 through 3 of the Criteria Review and Approach Document (CRAD) which includes:  1.0 Number and Title: (Example: CRAD-3 Quality Assurance)  2.0 Objective:			

	3.0 Criteria: (Example: Lines of Inquiry or a Checklist)				
	4.0 Records Reviewed: (Example: Number, Issue, and Title)				
	5.0 Interviews: (Example: Date and Title)				
	6.0 Field and/or Work Activities Reviewed: (Example: Date and Activity)				
	7.0 Discussion of Results: (Provide details related to the conclusion)				
	8.0 The objectives were "Met" or "Not Met".				
	9.0 Conclusion: (including Significant Deficiencies, Deficiencies,				
	Observations)				
	Note: See sample Recommended (CRAD) Format				
Step 9	Lead Assessor: Compiles CRADs for use during the assessment				
ASSESSME	NT PERFORMANCE				
Step 10	Lead Assessor: Conducts a pre-assessment meeting with the assessment team, appropriate management and staff of the Organization Assessed, to review the scope and the status of the related program and work activities planned to be reviewed/assessed.				
Step 11	Lead Assessor: Documents the pre-assessment meeting attendance on an attendance sheet.				
Step 12	Lead Assessor and any additional Assessment Team Members: Selects pertinent processes or work activities for observation, personnel for interviews and documents for review as needed to complete each checklist item.				
Step 13	Lead Assessor and any additional Assessment Team Members: Examines objective evidence in depth and determines if elements are effectively implemented.				
	Note: Notify the Lead assessor of any Significant Deficiencies found during the assessment.				
Step 14	Lead Assessor and any additional Assessment Team Members: Completes the CRAD information as they conduct the assessment including documentation of potential deficiencies and observations.				
Step 15	Lead Assessor: Conduct daily caucus with the Assessment Team Members to discuss progress in the planned assessment activities, and any potential areas for improvement or deficiencies.				
Step 16	Lead Assessor: Conduct daily meetings with the management of Organization Assessed to report progress, emerging issues, status of the assessment, and to coordinate required support for the assessment.				
	Note: Immediately notify the management of the audited organization of any Significant Deficiencies found during the assessment.				

Step 17	Lead Assessor: Conducts a post-assessment meeting to present the preliminary assessment results to appropriate organizational management.				
Step 18	Lead Assessor: Documents meeting attendance on an attendance sheet.				
POST ASSE	SSMENT ACTIVITIES				
Step 19	Lead Assessor and any additional Assessment Team Members: Completes CRAD information for use in the Assessment Report				
Step 20	Lead Assessor: Prepares an Assessment Report using inputs from the Team Members for their respective areas of assessment. The report should identify:				
	Cover page including Assessment Report Title, Date, Organization Assessed and Signature Block  1.0 Executive Summary				
	2.0 Introduction				
	3.0 Verification Approach				
	4.0 Team Organization, Composition, And Qualifications				
	5.0 Team Preparation				
	6.0 Site Coordination And Support				
	7.0 Schedule				
	8.0 Results 9.0 Conclusions				
	10.0 Lessons Learned				
	11.0 Corrective Action Plan Requirements				
	12.0 References				
	13.0 Attachment A: Team Leader Letter Of Appointment (if applicable)				
	14.0 Attachment B: Criteria Review And Approach Documents				
	15.0 Attachment C: Team Assignments, Qualifications And Concurrence (if applicable)				
	Note: See sample Recommended Assessment Report Format				
Step 21	Lead Assessor: Provides a copy of the report to the Organization Assessed for factual accuracy review.				
Step 22	Lead Assessor: Resolves any factual accuracy issues with the Organization Assessed and complete the Final Report.				
Step 23	Lead Assessor: Provides a copy of the final report to the Organization Assessed.				
Step 24	Lead Assessor: Assembles an Assessment Case File containing the final Report and supporting documentation.				

#### 3. References – Forms/Attachments/Exhibits

- Independent Assessment Review Plan Format
- CRAD Format, Samples SCI CRAD Used for Assessments; Sample Contractor
  Assurance CRAD; Sample Work Planning Control CRAD; Sample Radiological Controls
  CRAD; Sample Environmental Management CRAD; and Sample SCWE CRAD.
- Independent Assessment Final Report Format

#### 4.0 Records Generation

Records generated through implementation of this procedure are identified as follows and are maintained by the Office of Technical Support and Asset Management in accordance with the EMCBC Organization File Plan:

#### RECORDS TABLE

Records Category Code	Records Title	Responsible Organization	QA Classification (Lifetime, Non- Permanent, or N/A)
ENV 01-B-04-B	*Assessment Case File – Quality Assessments	Office of Technical Support and Asset Management or applicable Field Office	Non-Permanent – maintained as a QA Record for one year after fiscal year the Corrective Actions are closed.

<sup>\*</sup>Contact the EMCBC Records Management Field Officer for the appropriate Record Category Code for Assessment Case Files other than Quality Assessments.

## **EMCBC RECORD OF REVISION**

### **DOCUMENT TITLE: Independent Assessment**

If there are changes to the controlled document, the revision number increases by one. Indicate changes by one of the following:

- l Placing a vertical black line in the margin adjacent to sentence or paragraph that was revised.
- l Placing the words GENERAL REVISION at the beginning of the text.

Rev. No.	Description of Changes	Revision on Pages	Date
0	Initial Procedure		07/31/12
1	Add statement about Independence of assessors, add "comments" to definition of Observation, change term "ATL" to "LA", delete attendance sheet, And other minor changes.	All	10-23-13